

AO 91 (Rev. 11/11) Criminal Complaint

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UNITED STATES DISTRICT COURT

for the

Southern District of Texas



United States Courts
Southern District of Texas
FILED

April 18, 2025

Nathan Ochsner, Clerk of Court

United States of America

v.

Case No. **4:25-mj-233**

Sitameriam Nurai Ibrahim

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2/22/2025 in the county of Harris in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 875

Interstate Communication of a Threat

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.

Complainant's signature

Joshua Henry, Special Agent, DHS FPS

Printed name and title

Sworn to by telephone. ☐ *Not required*Date: April 18, 2025

Judge's signature

City and state: Houston, Texas

Dena Hanovice Palermo, U.S. Magistrate Judge

Printed name and title

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

v.

Sitameriam Nurai Ibrahim

CASE NO. **4:25-mj-233**

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Joshua Henry, being duly sworn deposes and states the following:

1. I am a Special Agent with the United States Department of Homeland Security – Federal Protective Service (DHS FPS), and I am submitting this affidavit in support of a criminal complaint charging Sitameriam Nurai Ibrahim with violations of 18 U.S.C. § 875 – Interstate Communication of a Threat.

2. The facts that support a finding of probable cause that Sitameriam Ibrahim committed the offense described above are as follows:

3. Affiant is a Special Agent with DHS FPS and has been a law enforcement officer involved in felony criminal investigations for the past sixteen years. Affiant has graduated from the Federal Law Enforcement Training Center, Criminal Investigator Training Program, where training was received in enforcement of the above listed statute. Affiant has testified in judicial

proceedings and presented violations of the above statute for prosecution. Affiant has participated in numerous criminal investigations in the course of Affiant's official duties which have led to arrests, indictments, and convictions.

4. The information in the following paragraphs, furnished in support of this affidavit, comes from the personal investigation of Affiant and from information relayed to Affiant directly by other officials or through Affiant's review of their investigative reports.

5. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant, and it does not set forth all of my knowledge about this matter.

6. On November 5, 2002, Ibrahim was ordered removed by the immigration judge (IJ) because she was a derivative beneficiary on her mother's I-589 application, but her mother's application was denied on Nov. 5, 2002 by the IJ. Since her claim was based on her mother's application, she was ordered removed when her mother's application was unsuccessful. Ibrahim appealed the denial, which dismissed the appeal on April 12, 2004, making it a final administrative decision. Seventeen years later, Ibrahim filed a motion seeking to reopen the removal order to pursue relief with USCIS. On Nov. 18, 2024, the BIA denied Ibrahim's motion to reopen finding no exception to the time limits by

which to file such a motion to reopen and that there was no exceptional situation to warrant reopening the removal order. On December 13, 2024, Ibrahim submitted a corruption complaint to the EOIR.

7. On February 18, 2025, at approximately 11:22pm, Sitameriam Ibrahim received an email from the Judicial Conduct and Professionalism Unit Executive Office for Immigration Review (EOIR) from email address Judicial.Conduct@usdoj.gov notifying Ibrahim that the complaint is closed.

8. On February 19, 2025, Ibrahim responded from email address mibrahimm96@gmail.com and stated, "They officially dismissed my complaint regarding the actions of their corrupt judge, and I suspect that they did not take any punitive measures against her. However, I have reached a point of exhaustion with my efforts to seek justice, as it seems that such a concept no longer holds any genuine value in today's system."

9. On February 22, 2025, at approximately 11:22pm Ibrahim responded from email address mibrahimm96@gmail.com and stated, "*Big fucking mistake. All yall gone die now. At approximately 11:23pm Ibrahim stated, I'm sending my killers your way bitch office of professionalism unit. Ima have em spread out bombs all across your EOIR offices. Everyone one of your immigration judges will Be dead.*"

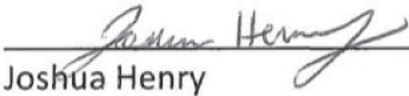
10. On March 18, 2025, Ibrahim was interviewed at 17744 Wayforest Dr. Apartment 3310, Houston, TX 77060. Ibrahim's threatening emails were read aloud, and Special Agent asked why those emails were sent. Ibrahim stated, "I sent all that stuff after I was so sick about something I saw in the media about an 11-year-old girl getting bullied about her immigration status then committed suicide." Ibrahim mentioned that she is not a citizen of anywhere and was born in Saudi Arabia with East African parents. Ibrahim was asked if she was a part of any groups. She was also asked who she was referring to in her threat to send people to the DOJ to spread out bombs. Ibrahim mentioned she doesn't know anybody and stated she made the threat because she was really upset and because they tried to set her up to take blame for the New Orleans attack. Ibrahim mentioned that she did not have access to email address mibrahimm96@gmail.com anymore. Ibrahim acknowledged sending email threats to the government was wrong, however, she was frustrated.

11. On April 7, 2025, a Lexus Nexus search was conducted for email address mibrahimm96@gmail.com. The results revealed the owner's information to be registered to Sitameriam Ibrahim aka Mariam Ibrahim at address 17744 Wayforest Dr. Houston, TX 77060.

12. On March 17, 2025, Affiant reviewed Ibrahim's criminal record. Ibrahim had been arrested for Assault in 2013 and Criminal Mischief in 2018.

13. Affiant believes there is sufficient probable cause to arrest Sitameriam Ibrahim for the violations above as those threats intimidated multiple employees of the United States Government, who were performing in the course of their official duties. Accordingly, I respectfully request that this court issue an arrest warrant for Sitameriam Ibrahim.

I, Joshua Henry, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.


Joshua Henry
Special Agent
United States Department of
Homeland Security
Federal Protective Service

Subscribed and sworn to me by telephone on this the 18th day of April 2025, and I find probable cause.


The Honorable Dena Hanovice Palermo
United States Magistrate Judge